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8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 LUIS ANGEL VICENTE MARTIN GUDIEL,

15 Defendant.

Case No. 18-mj-292-CWH

**STIPULATION TO CONTINUE  
PRELIMINARY HEARING**  
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United  
18 States Attorney, and Elham Roohani, Assistant United States Attorney, counsel for the United  
19 States of America, and Rene L. Valladares, Federal Public Defender, and Brenda Weksler,  
20 Assistant Federal Public Defender, counsel for Luis Angel Vicente Martin Gudiel, that the  
21 Preliminary Hearing currently scheduled on March 21, 2018 at the hour of 4:00 p.m., be vacated  
22 and continued to a date and time convenient to the Court, but no sooner than thirty (30) days.

23 This Stipulation is entered into for the following reasons:

24 1. Counsel for the Government needs additional time to provide the defense with  
25 the discovery in this case.  
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2. Further, counsel for the defense will need to review the discovery in this case in order to determine if an agreement can be met, or if it will ultimately go to a hearing.

3. The defendant is incarcerated and does not object to a continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this Stipulation is excusable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).

This is the first request for continuance filed herein.

DATED this 19th day of March, 2018.

RENE L. VALLADARES  
Federal Public Defender

DAYLE ELIESON  
Acting United States Attorney

*/s/ Brenda Weksler*  
By \_\_\_\_\_

*/s/ Elham Roohani*  
By \_\_\_\_\_

BRENDA WEKSLER  
Assistant Federal Public Defender

ELHAM ROOHANI  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

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6 LUIS ANGEL VICENTE MARTIN GUDIEL,

7 Defendant.

Case No. 18-mj-292-CWH

**ORDER**

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on  
12 March 21, 2018 at the hour of 4:00 p.m., be vacated and continued to April 23, 2018 at  
13 the hour of 4:00 p.m.

14 DATED this 20th day of March, 2018.

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17 UNITED STATES MAGISTRATE JUDGE  
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